EASTERN DISTRICT OF NEW YORK		
MARTIN JONATHAN BATALLA VIDAL	X _, et al.,	Case No.16-cv-04756-NGG-VMS
Plaintiffs, v.		NOTICE OF MOTION
		TO ADMIT COUNSEL
ALEJANDRO N. MAYORKAS, et al.,		PRO HAC VICE
Defendants.	X	
TO: Opposing Counsel		
PLEASE TAKE NOTICE that upon the annex	ed affidavit of movant	in support of this motion and
the Certificate(s) of Good Standing annexe	ed thereto, I <u>Chiraay</u> u	u Gosrani will move this
Court pursuant to Rule 1.3(c) of the Local	Rules of the United Sta	tes District Courts for the
Southern and Eastern Districts of New Yor	k for an order allowing	the admission of movant, a
member of the firm of the National Immigra	ation Law Center and a	member in good standing of
the bar(s) of the State(s) of <u>California</u>	· · · · · · · · · · · · · · · · · · ·	, as attorney <i>pro hac</i>
vice to argue or try this case in whole or ir	n part as counsel for	
Plaintiffs Martin Batalla Vidal, et al.	There	are no pending disciplinary
proceedings against me in any state or fed	deral court. (If there ar	e any disciplinary proceedings,
describe them.)		
	Respectfully submit	ted,
Dated: 02 06 2023	Clary	<u> </u>
	Signature of Movant	
		Immigration Law Center
	Address 3450 Wilsh	
		es, CA 90010
	Email <u>gosrani@nilc.</u> Phone (213) 639-390	
	FIIOTIE (210) 000 000	